



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ECOSYSTEMS, TRIBAL AND  
PUBLIC AFFAIRS

April 30, 2012

Monica Schwalbach, Forest Supervisor  
Wallowa-Whitman National Forest  
P.O. Box 907  
Baker City, Oregon 97814

Re: U.S. Environmental Protection Agency (EPA) Comments for the Wallowa-Whitman National Forest (Forest), Whitman Ranger District; Snow Basin Vegetation Management Project (Project) Final Environmental Impact Statement (FEIS) (EPA Project Number: 08-065-AFS).

Dear Ms. Schwalbach:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. Under our policies and procedures, we evaluate the environmental impact of the proposed action and the adequacy of the impact statement.

In our May 30, 2011 comments on the Draft EIS we assigned a Lack of Objections rating to the Draft EIS, and, noted our support for the Project Objectives and Alternative 2 – the preferred alternative at that time. We also described two opportunities for mitigation measures which we believed could be accomplished with minor changes to the proposal.

Our first recommendation was for the application of additional mitigation measure for the reconstruction of closed roads which have stabilized, or, in the words of the DEIS, "...are extensively grown in." In the FEIS's response to our comment, the Forest indicates agreement with our statement. We appreciate the FEIS response's explanation of how the Forest applies road rehabilitation measures that far exceed our recommended application of Standard Provision BT6.63. More broadly, we agree with your Record of Decision's conclusion that the selected alternative would provide better protection of resources from the potential impacts of temporary road construction than alternatives 2 or 3.<sup>1</sup>

Our second recommendation was for the FEIS to include a Project Design Feature/ Best Management Practice/ Mitigation Measure which addresses levels of coarse wood required to protect long-term soil productivity. One reason for this comment is the issue of overall sustainability of utilizing coarse wood for bioenergy or other non-timber forest product purposes. Your response that high fire frequency ecosystems have persisted for thousands of years with low levels of coarse woody debris is valid. We expect the Forest Service and other land management agencies to continue to examine needed levels of coarse wood for long-term soil productivity and we now recognize that such questions may be most important for the management of mixed fire severity ecosystems.

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<sup>1</sup> ROD, p. 9

We appreciate your substantial efforts to respond to the EPA's as well as members of the public and other agencies' comments and concerns regarding this project. If you have any questions please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov), or you may contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at [peterson.erik@epa.gov](mailto:peterson.erik@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Christine B. Reichgott". The signature is written in a cursive style with a large, stylized 'C' and 'R'.

Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit